

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SHAWN DRUMGOLD,	)	C.A. NO. 04-11193NG
Plaintiff	)	
	)	
v	)	
	)	
TIMOTHY CALLAHAN, ET AL.	)	
Defendant(s)	)	
	)	

**PLAINTIFF'S MOTION FOR LEAVE TO FILE RESPONSE TO CITY OF BOSTON'S  
STATEMENT OF UNCONTESTED MATERIAL FACTS**

The Plaintiff in preparation for oral argument on the Motions for Summary Judgment determined that he had erroneously thought that the City of Boston did not file a Statement of Material Issues of Fact. In reviewing the filings Plaintiff determined that he was in error. Plaintiff now moves to file the attached response to the City's Material Issues of Fact and apologizes to the Court and parties for the confusion.

The Plaintiff notes that the response raises no legal issues or material facts which were not fully developed in Plaintiff's response to the City's Motion. There is no prejudice to the City from allowing the filing of this response.

Respectfully submitted,  
By His Attorney,

/s/ Michael Reilly

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